



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

December 14, 2021

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Shaibi et al. v. Jaddou*, 21-cv-6780 (PGG)

Dear Judge Gardephe:

This Office represents the government in the above-referenced action. Pursuant to the parties' joint request, the Court set a modified briefing schedule to address mootness, under which the government's brief is due today, December 14, and the plaintiffs' brief in response is due by December 23; the Court also set a conference for January 27, 2022. *See* ECF No. 54. I write respectfully to request a three-day extension of the government's deadline, until Friday, December 17, to file its brief. I make this request because I became ill early this morning, and I anticipate that I will be out of the office for at least today and tomorrow resting and recovering. I hope to be well enough to get back to work later this week, but given my current state, I am unfortunately unable to prepare the government's brief by the current deadline today.

I emailed opposing counsel shortly after 6:00 a.m. this morning to seek his consent on this request when it became apparent that I was unwell, and to ask counsel which date he would like me to seek for his response brief. But as of the filing of this letter (shortly before 1:00 p.m.), I have not received a response, though I understand counsel is located in California, so there may be a delay due to the different time-zone. While I ordinarily would prefer to wait to file an extension request with opposing counsel's position, given the government's deadline today, I am filing this request now. But given the upcoming holidays, and mindful that plaintiffs' counsel may have conflicts, I would consent to any date at the end of December or early January that counsel for the plaintiffs would like to select for the deadline to file plaintiffs' brief in response.

I thank the Court for its consideration of this request, and apologize that it is being made the day that the government's brief is due; however, as noted, the request is prompted by unforeseen developments that only just occurred early this morning.

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Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

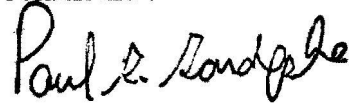
By: /s/ Brandon M. Waterman
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cc: Counsel of Record (by ECF)

MEMO ENDORSED:

The application is granted. The Government's
brief is now due by **December 17, 2021**.
Plaintiffs' opposition papers, if any, are now due
by **December 29, 2021**.

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: December 14, 2021